

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

In the Matter of)

Advanced Television Systems)
and Their Impact Upon the)
Existing Television Broadcast)
Service)

MM Docket No. 87-268

To: The Commission - Mail Stop 1170

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REPLY COMMENTS OF THE COMMUNITY BROADCASTERS ASSOCIATION

Introduction

1. In an extraordinary level of participation in a rule making proceeding by individual licensees and by the low power television (LPTV) industry, more than 50 licensees of LPTV stations filed initial comments in this proceeding, representing more than one-third of the total comments filed. This unprecedented level of active response by individual licensees in a television rule making underscores the exceptional importance of local service provided by LPTV stations and the significant social and economic harm that will result to both the public at large and to LPTV entrepreneurs, who have invested substantial amounts of money and created thousands of jobs, if LPTV stations are not properly accommodated in a digital television environment. After reviewing the initial comments, CBA believes that the best plan is to establish a market-driven, rather than a government-driven, transition program to digital television (DTV) -- one that will not require that a second channel be either given or auctioned to any NTSC full or low power station.

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2. These Reply Comments are submitted on behalf of the Community Broadcasters Association (CBA), the national trade association of the LPTV industry.^{1/} As CBA noted in its initial comments, the Commission has in the past used LPTV's "secondary" spectrum status under Section 74.703 of the Rules as a reason to ignore LPTV in spectrum planning for the migration of the nation's television system from NTSC to DTV. This neglect is clearly contrary to the public interest, as it improperly dismisses fastest growing, job-creating segment of the television industry and the only segment that directs its efforts primarily toward meeting the needs of smaller and specialized markets, including both geographically small communities and minority, ethnic, and other special interest groups.^{2/}

Importance of LPTV

3. The exceptionally high level of participation by LPTV licensees in this proceeding underscores that the interests of LPTV broadcasters are real and require careful attention. The LPTV industry has asked for no preference or priority over full power stations in the DTV allotment process and has not proposed to deprive any operating full power station of its ability to acquire a DTV channel before others are allowed to do so. However, there is no logical reason why LPTV operators should not be permitted to acquire DTV channels after full power stations but before the general public is given an opportunity to apply. No initial comments

^{1/} The CBA conducts various activities on behalf of the LPTV industry and represents the interests of the LPTV industry in public policy forums. CBA filed its initial comments in this proceeding on November 20, 1995. These Reply Comments are directed at the initial comments filed by others in response to the *Fourth Further Notice of Proposed Rule Making and Third Notice of Inquiry*.

^{2/} The initial comments of CBA and John Kompas and Jacquelyn Biel, among others, provided specific examples of the unique local programming services provided by LPTV stations.

contradicted this proposition. Indeed, many full power licensees, who commented individually and in consolidated comments under the name "Broadcasters," acknowledge that existing local broadcasters, who "already demonstrate many of the characteristics that the Commission and Congress have found to serve the public interest," including representation of local interests and the provision of public service programming, should be given priority in DTV channel allotments before those who do not currently provide any over-the-air service.^{3/} LPTV stations fit within this category at least as much, and often more, than full power stations. All operating local broadcast services should take precedence in DTV allocations over entities that do not currently provide service.

4. In their initial comments, the Digital HDTV Grand Alliance and others strongly advocated the preservation of existing local broadcast service while ensuring efficient use of the television spectrum.^{4/} CBA agrees with these objectives and believes that both may be achieved in a realistic and practical fashion. However, as pointed out in CBA's initial comments, the full power television industry is not going to take the initiative in preserving localism insofar as LPTV is involved. The Commission must intervene, pursuant to its statutory obligation to act in the public interest.

5. The LPTV industry represents millions of dollars of investment and thousands of employment opportunities. Attached hereto as Appendix A is a list of over 100 LPTV stations with amounts invested in each. This is only a partial list of LPTV stations and represents only

^{3/} Broadcasters' Comments at p. 8.

^{4/} Digital HDTV Grand Alliance Comments at pp. 2-11.

part of the industry's investment.^{5/} Also attached as Appendix B are a national map and 50 state maps, showing the very significant geographic areas covered by LPTV signals.^{6/} These Appendices demonstrate clearly that the LPTV industry has a substantial and meaningful presence in the broadcasting community that must be taken into account in the Commission's deliberative processes.^{7/}

CBA's Proposal

6. Awarding a second channel to each existing broadcaster during a transition period from NTSC to DTV is an inefficient use of spectrum, because it will commit 12 MHz of spectrum to a station that can otherwise operate with 6 MHz; will require an enormous investment by the broadcasting industry in duplicative equipment that is not necessary; will generate local disputes over tower construction and environmental matters; and will do little to help the public, because some 70% of the public watches television via cable rather than over-the-air and thus can receive only what the cable system distributes, regardless of what is transmitted over the air. Further, awarding a second channel is fraught with political pitfalls.

5/ This list is a compilation of information recently submitted on a voluntary by stations in response to a fax request from CBA. Because the submission of information was voluntary with a short time limit, there were omissions in the responses that resulted in gaps on the chart. Also, voluntary response surveys always underreport the information they seek to compile because many entities do not respond at all.

6/ The maps were prepared by K-B, Ltd. of Milwaukee, Wisconsin. They assume a uniform 20-mile service radius for each station and are not based on individual calculations of each station's service area. This uniform assumption is considered a realistic average, although it overstates the coverage of some stations and understates the coverage of others.

7/ The value of LPTV is recognized by entities whose objective is to preserve the public interest rather than private economic interests. *See* Comments of Media Access Project *et al.*, at page 8.

Thus the Commission should carefully consider options that do not involve dual-channel operation by any licensee.

7. It should be self-evident that single-channel operation is a more efficient use of the spectrum than dual-channel operation. Moreover, if there is no dual-channel operation, the Commission will eliminate the burdensome task of figuring out how to double the number of channels in use without causing interference and how to resolve inevitable disputes among broadcasters as to who should get which second channel and whether their particular DTV channel really provides equivalent coverage to their NTSC channel.^{8/} It will also eliminate the need for every NTSC broadcaster to bear the expense of a second transmitter and antenna and the burden of finding tower space for the second antenna -- space that may involve costly tower construction or reinforcement and in many cases will generate serious conflicts with local officials bent on stopping the construction of any new towers in their community for aesthetic and/or environmental reasons.^{9/} Finally, unless cable systems are required to convert to digital operation at the same time as broadcast stations -- again an enormous financial burden on that industry -- and are required to carry the full capacity of the broadcaster's DTV service, the 70% of the public that watches television primarily via cable will not reap the benefits of DTV, and a substantial portion of the benefits intended from the television industry's investment in DTV will not be realized.

^{8/} Indeed, dissatisfaction over second-channel allotments is likely to lead to litigation and/or horse-trading of channels that could degenerate into the kind of "private auction" the Commission has sought to avoid during the past few years.

^{9/} The environmental impact issues arising from tower construction will require substantial private and government resources to resolve.

8. On the political side, the broadcasting industry has vigorously opposed the concept of auctioning the second channel and will accede to auctions, if at all, only for spectrum that may be recovered by the Commission at the end of the transition period. Further, the behavior of the full power TV industry indicates that many existing broadcasters do not want to invest at all in DTV or at least want to postpone the investment burden as long as possible without losing the opportunity altogether. On the other hand, if the FCC awards second channels for free, even if only temporarily, it will be loudly criticized by public interest groups, politicians, and others for a bonanza give-away of public resources to private industry. The uncomfortable, if not hopeless, political thicket created by these problems will be avoided if no second channel is awarded at all.

9. Moreover, all of the second-channel plans involve an undesirable government-driven transition to DTV rather than a more desirable market-driven transition. CBA urges the Commission to let the marketplace drive the process. Each television station, full and low power alike, should be permitted to convert from NTSC to DTV on its present channel at any time of its choice, subject only to some future outside time limit that need not be determined for several years, after experience has been gained with public acceptance of DTV. This system will work and will not leave the public without service. At the Commission's *En Banc* hearing on DTV on December 12, 1995, Mr. Bruce Allan, Vice President, Technology & Business Development, of Thomson Consumer Electronics, a television receiver manufacturer with a substantial market share, stated that Thomson will almost certainly offer only dual-standard receivers shortly after ATV standards are adopted by the Commission, because it will be difficult to sell NTSC-only receivers once the public knows they will become obsolete in

several years. If Thomson plans to market only dual-standard receivers, then it must already know that it is possible to produce such receivers at a cost the market will bear. If that is so, then it should also be possible to produce and market converter boxes that will display DTV transmissions on an NTSC receiver at a reasonable price.

10. The Commission should devote whatever resources are available to it to ensuring that reasonably-priced DTV-to-NTSC receivers are brought to the market place early on.^{10/} Once that happens, the dual-channel issue should disappear, because any member of the public will be able to receive a station's transmissions regardless of which transmission standard is used. The expense, interference, and local zoning and environmental problems associated with dual-channel operation will be avoided. LPTV displacement, with the accompanying loss of local service and jobs, will be avoided. The timing of conversion of both television stations and cable systems to DTV may be left to the market place. And when the conversion to DTV has finally been completed, the Commission will be able to consider repacking the television spectrum to free up spectrum for more stations or other uses.

Alternative Proposal

11. If the Commission does not agree that dual-channel operation can or should be avoided, then much more must be done to preserve local LPTV service than the Commission or the full power television industry has done so far. If the Commission is not willing to establish avoidance of LPTV displacement a priority in its DTV channel allotment process,

^{10/} This may be done through the "universal service fund" concept advocated by Media Access Project *et al.*, at p. 35 of their comments, or through any number of other approaches. CBA's point is that the Commission should focus its attention on promoting the widespread dissemination of converters rather than on how to give broadcasters more spectrum.

then, as urged in CBA's initial comments, it must publish a proposed full power DTV allotment table and allow at least 120 days for LPTV licensees and permittees to propose individual changes that would avoid displacement of their station. Then, after a final DTV allotment table is adopted, a period of time must be allowed during which existing LPTV stations may apply for a second channel for DTV operation before the general public is invited to apply. Those LPTV stations unable to find a second channel should be allowed to convert from NTSC to DTV on their existing channel when and as they elect to do so.^{11/} And very importantly, once the transition to DTV has been completed, there will no longer be any reason to treat LPTV stations as secondary spectrum users, and digital LPTV stations should be afforded primary status.

Conclusion

12. The importance of local LPTV service may not be ignored. The LPTV problem, and many other serious ones as well, will be avoided if the Commission does not award a second channel for DTV transition purposes. The Commission must in any event take steps to minimize LPTV displacement by DTV and to provide for the conversion of LPTV stations from NTSC to DTV. To that end, CBA urges the Commission to adopt the proposals in these reply comments, as well as those in CBA's initial comments, including considering reserving channels exclusively for digital LPTV and accommodating LPTV stations whose displacement

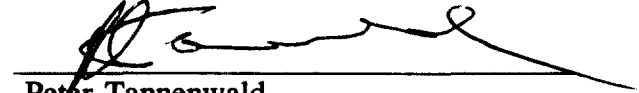
^{11/} As discussed in CBA's initial comments, if a locally programmed LPTV station in a community cannot otherwise be accommodated and would otherwise be forced to go dark, the full power broadcasters in the market should be obligated to make one of their compressed channels available to distribute the LPTV programming.

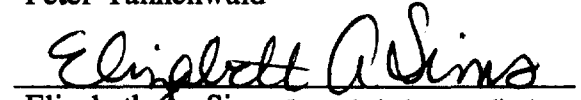
is unavoidable by affording access to part of the multichannel capacity gained by full power stations in the DTV environment.

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January 16, 1995

Respectfully submitted,


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Elizabeth A. Sims (bar admission pending)

Counsel for the Community
Broadcasters Association

Comments of Community Broadcasters Association

MM Docket No. 87-268

EXHIBIT A

STATION	CITY/STATE	FAX	VIEWERS REACHED OFF AIR SIGNAL	DATA USED	ADDITIONAL VIEWERS BY CABLE	TOTAL COST- LICENSE	COST FOR TRANSMITTER	PROG. ORIGIN. EXPENSES	START-UP COSTS	UHF/VHF
KHSK TV 27	PHOENIX	415-775-9536	1,328,000	HAND		\$1,310,000	\$115,000	\$289,000	\$915,000	UHF
K38DU	SIOUX CITY, IA	515-597-3415	154,000	HAND		\$61,000	\$46,000	\$10,000	\$5,000	UHF
K22BH	AMES, IA	"	159,000	HAND		\$112,000	\$79,000	\$17,000	\$16,000	UHF
K34DG	IOWA CITY, IA	"	138,000	HAND		\$47,000	\$37,000	\$11,000	\$5,000	UHF
W44BF	LA CROSSE, WI	"	121,000	HAND		\$87,000	\$74,000	\$11,000	\$12,000	UHF
K45CQ	COUNCIL BLUFF IA	"	854,000	HAND		\$143,000	\$114,000	\$14,000	\$15,000	UHF
K53EY	OMAHA, NE	"	854,000	HAND		\$143,000	\$114,000	\$14,000	\$15,000	UHF
K35CY	DES MOINES, IA	"	698,000	HAND		\$137,000	\$89,000	\$38,000	\$10,000	UHF
KSSY-TV	RIPOMO, CA	805-929-4591	228,000	WELSEN		\$300,000	\$108,000	\$75,000	\$125,000	
K38CW	CA	310-439-6499	218,000	HAND	\$65,000	\$75,000	\$58,000	\$22,000	\$38,000	UHF
W49BG	CHARLESTON, SC	"	300,000	DATA SERVICES		\$78,000	\$65,000	\$5,000		UHF
K59AM	FL	954-983-9099	1,000	ANTENNA SURVEYS		\$78,000	\$60,000	\$40,500		UHF
K57AF		"	1,000	ANTENNA SURVEYS		\$78,000	\$60,000	\$40,500		UHF
K12FY		"	1,000	ANTENNA SURVEYS		\$70,000	\$60,000	\$40,500		VHF
K03CR		"	1,000	ANTENNA SURVEYS		\$70,000	\$60,000	\$40,500		VHF
K10FQ		"	1,000	ANTENNA SURVEYS		\$70,000	\$68,000	\$40,500		VHF
K62AU		812-782-8222	28,000		4,000	\$108,000				UHF
K58DS		SAME	28,000		2,000	\$37,000				UHF
K145C	APPLETON, WA	509-385-2313	13,000	HAND		\$120,000	\$40,000	\$70,000	\$10,000	VHF
CH 39			40,000	HAND	30,000	\$300,000	\$205,000	\$75,000	\$25,000	UHF
W49AW	MYRTLE BCH, SC					\$78,000	\$40,000	\$38,000		UHF
K1MV	TOPEKA		185,000	WELSEN	\$206,000	\$1.4 MILLION	\$320,000	\$450,000	\$850,000	UHF
	BRANSON, MO	417-334-5209	40,000			\$128,000	\$40,000	\$108,000	\$10,000	

STATION	CITY/STATE	FAX	VIEWERS REACHED OFF AIR SIGNAL	DATA USED	ADDITIONAL VIEWERS BY CABLE	TOTAL COST- LICENSE	COST FOR TRANSMITTER	PROG. ORIGIN. EXPENSES	START-UP COSTS	UHF/VHF
W14AU	REDSVILLE, NC		86,000	HAND	44,800	\$268,000	\$143,000	\$182,000	\$23,000	VHF
WRAP	BOSTON,MA		1,106,000.00	DATA		\$738,000	\$80,000	\$58,000		
WARP	TAMPA, ST. PETE,FL.		850,000	DATA		\$115,000	\$65,000	\$58,000		
WROT-TV	CA	415-922-3030	583,324	DATA		\$89,800	\$68,500	\$10,310	\$500	
K08LC			75,860	HAND		\$78,200	\$14,000	\$75,000	\$38,000	VHF
KBF-TV 30	SAN. FRAN. CA		4,358,689	DATA		\$1,013,900	\$238,000	\$535,000	\$51,000	UHF
KPD-TV			1,189,000	DATA	148,000	\$158,600	\$108,900	\$38,800	\$38,000	
WDNN-LP	WHITFIELD GA		275,000	NIELSEN/DATA	25,000					
W47BA	GA		88,200	"		\$65,000	\$150,000	\$400,000	\$100,000	UHF
W6SDI	CHATANOOGA, TN		113,280	NIELSEN/DATA						UHF
W27BQ	CLEVELAND, TN		455,000	NIELSEN/DATA						UHF
K62EG	ST. LOUIS, MO	212-787-0351				\$150,000	\$65,000	\$80,000	\$5,000	UHF
W54AP	BLUE IS. AL					\$135,000	\$75,000	\$55,000	\$5,000	VHF
K53CH	MINN. MN					\$125,000	\$30,000	\$90,000	\$5,000	UHF
VIDEOHOUSE	PITTSBURG, PA	412-921-6937	280,000			\$1,000,000	\$325,000	\$108,000	\$525,000	
W58CX	NC	919-736-0042	110,000	HAND SURVEYS	75,000	\$237,000	\$150,000	\$35,000	\$2,000	UHF
WAZT-LP	WOODSTOCK, VA	540-459-5834	180,000	NIELSEN	20,000	\$975,000	\$125,000	\$325,000	\$400,000	UHF
K81GH	SAN DIEGO, CA	619-576-4346	280,000			\$1,250,000	\$100,000	\$700,000	\$300,000	UHF
WMMG-40	MUSKRAT, OH		75,000	HAND	49,500	\$180,000	\$35,000	\$30,00		VHF
WJAN-TV41	MIAMI, FL	305-692-3808	1,158,690	NIELSEN	825,000	\$7,750,000	\$1,000,000	\$3,450,000	\$3,000,000	
W10CI	VERO BCH, FL	305-861-8889	86,000	NIELSEN	82,700	\$180,000	\$65,000	\$50,000	\$85,000	VHF
WCWYVA	IRRGENTON, WI	715-535-3365	2,140	HAND	140	\$38,000	\$15,000	\$3,000	\$1,000	
			105,000	NIELSEN	\$200,000	\$1.4 MILLION	\$120,000	\$450,000	\$550,000	VHF
	BRANSON,MO	417-334-5209	40,000			\$128,000	\$80,000	\$108,000	\$10,000	
W67CI			288,000	COMM. DATA	\$1,500,000.00	\$350,000	\$120,000	\$150,000	\$35,000	UHF

STATION	CITY/STATE	FAX	VIEWERS REACHED OFF AIR SIGNAL	DATA USED	ADDITIONAL VIEWERS BY CABLE	TOTAL COST- LICENSE	COST FOR TRANSMITTER	PROG. ORIGN. EXPENSES	START-UP COSTS	UHF/VHF
WRNJ-TV		908-850-0001	6,000			\$180,000	\$52,000	\$26,000		
WVOC-TV		912-376-1612	10,000	HAND	8,000	\$50,000	\$28,000	\$28,000	\$10,000	
KOEG		908-784-1138	40,000	HAND	22,000	\$105,000	\$32,000	\$38,000	\$7,000	
W69CF CH. 9	JACKSONVILLE FL	202-482-3781	148,693	COMM. DATA SERVICES		4106,000	\$28,000		\$2,000	VHF
W28AW	GREENSBURG, PA		2,500			\$107,000	\$40,000			UHF
W22BN		202-748-4262	78,000	HAND		\$108,000	\$40,000	\$48,000	\$5,000	UHF
CH. 34	CA	916-244-5895	50,000	POP.	20,000	\$188,000	\$48,000	\$48,000		UHF
W26AS	CLARKVILLE, IN	912-940-9836	200,000	CALLS	4,000	\$158,000	\$80,000	\$45,000	\$5,000	UHF
W65BE	JEFFERSVILLE, IN		200,000	CALLS	4,000	\$158,000	\$80,000	\$45,000	\$5,000	VHF
W88CT	LOUISVILLE, KY		200,000	CALLS	4,000	\$158,000	\$80,000	\$45,000	\$5,000	VHF
TV 47	OH	419-224-8867	85,000	NIELSEN	22,000	\$520,000	\$280,000	\$230,000		UHF
KD5N	COLUMBIA, MO	314-374-0888	90,000		3,000	\$250,000	\$125,000	\$123,000		VHF
WTBL-LP	MO	704-754-8853	38,000	CENSUS	48,000	\$120,000	\$58,000	\$50,000	\$28,000	
WBOP-TV	PENSACOLA, FL	904-433-2537	53,000	OTHER	75,000	\$200,000	\$50,000	\$125,000		
			2,408,000	ARBITRON		\$340,000	\$1,805,000	\$200,000	\$850,000	
W52AZ	EVANSVILLE, IN	912-423-3405	278,900	NIELSEN	\$78,600	\$1,300,000	\$445,000	\$200,000	\$850,000	UHF
WKY TRANSLATOR			135,000	NIELSEN		\$50,000				UHF
WJPS TRANSLATOR			135,000	NIELSEN		\$50,000				UHF
W49AX	LOUISVILLE, KY		432,000	ARBITRON			\$350,000		\$100,000	UHF
W68CG AUTOMATED NETWORK	NASHVILLE, TN		474,300	ARBITRON			\$100,000			UHF
W34BE AUTOMATED NETWORK	KNOXVILLE, TN		379,000	ARBITRON			\$100,000			UHF
W3DE AUTOMATED NETWORK	NASHVILLE, TN		474,300	ARBITRON		\$95,000	ALL			
WRMX AUTOMATED	NASHVILLE, TN		325,000	ARBITRON		\$175,000	\$115,000			
W22AU-TRANSLATOR FOR W34BE	SEVIerville, TN		55,000	ARBITRON		\$400,000	\$70,000			UHF
W67CB-TRANSLATOR FOR W52AZ	EVANSVILLE, TN		67,000	NIELSEN	3,500		\$125,000			UHF

[illegible]

STATION	CITY/STATE	FAX	VIEWERS REACHED OFF AIR SIGNAL	DATA USED	ADDITIONAL VIEWERS BY CABLE	TOTAL COST- LICENSE	COST FOR TRANSMITTER	PROG. ORIGIN. EXPENSES	START-UP COSTS	UHF/VHF
K43CN	DUNCAN, ARIZONA		12,250	HAND	2,200	\$45,500	\$36,400	\$5,460	\$3,640	UHF
K47DA	DUNCAN, ARIZONA		12,250	HAND	2,200	\$45,500	\$36,400	\$5,460	\$3,640	UHF
K49CN	RICHLAND, WASH.	509-946-9507	100,000	VOTING ROLLS	140,000	\$300,000	\$100,000	\$120,000	\$30,000	UHF
K47EV	WALLA, WALLA WASH.	509-946-9507	60,000	MAILING	60,000	\$140,000	\$110,000	\$55,000	\$14,000	UHF
VIBRANT LIVING	CA	916-222-2240	150,000	HAND	15,000	\$120,000	\$15,000	\$45,000		
K53DL	DUNCAN, ARIZONA		12,250	HAND	2,200	\$45,500	\$36,400	\$5,460	\$3,640	UHF
K56DM	DUNCAN, ARIZONA		12,250	HAND	2,200	\$45,500	\$36,400	\$5,460	\$3,640	UHF
K51DG	DUNCAN, ARIZONA		12,250	HAND	2,200	\$45,500	\$36,400	\$5,460	\$3,640	UHF
ELLINGTON, BROAD.	MS	601-375-9284	3,500	COUNTY	1,500	\$50,000	\$15,000	\$34,000	\$1,000	
ELLINGTON, BROAD.	MS	601-375-9284	3,500	COUNTY	1,500	\$50,000	\$15,000	\$34,000	\$1,000	
KUPA		888-244-8049	25,000			\$143,000	\$18,000	\$50,000	\$75,000	
COLSTRIP COLL.		408-748-2517	4,000	CENSUS		\$118,000	\$46,000	\$72,000		
			150,000	HAND		\$1,263,639	\$88,637	\$152,324	\$1,002,678	
		717-459-1383	23,988	DATAWORLD	7,900	\$250,000	\$138,140	\$111,000	\$41,860	
W24BB					4,500	\$82,000	\$75,000	\$13,000		UHF
W88CF					5,000	\$38,000	\$28,000	\$2,000		UHF
W47AO					10,000	\$48,000	\$45,000	\$10,000		UHF

[illegible]

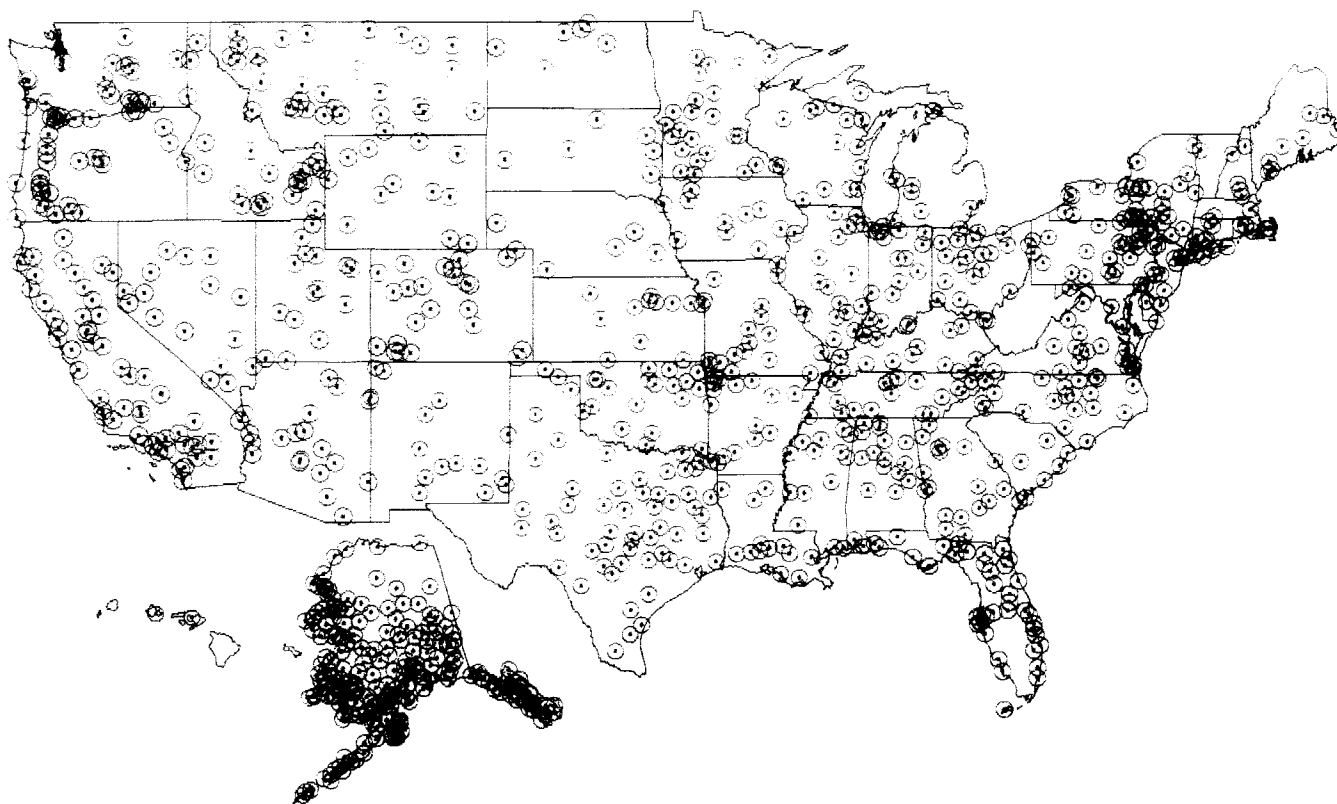
Comments of Community Broadcasters Association

MM Docket No. 87-268

EXHIBIT B

NATIONAL LPTV DISTRIBUTION

Community Broadcasters Association



LEGEND



State Boundaries



Station's Signal
(20 mile radius)

***Some circles represent multiple
stations in a single city***

AK: 274	KY: 20	NY: 85
AL: 29	LA: 28	OH: 33
AR: 23	MA: 10	OK: 48
AZ: 53	MD: 5	OR: 79
CA: 111	ME: 12	PA: 39
CO: 68	MI: 27	RI: 2
CT: 11	MN: 141	SC: 11
DC: 5	MO: 38	SD: 13
DE: 3	MS: 19	TN: 39
FL: 71	MT: 53	TX: 114
GA: 31	NC: 26	UT: 28
HI: 7	ND: 15	VA: 27
IA: 15	NE: 21	VT: 6
ID: 43	NH: 7	WA: 49
IL: 27	NJ: 5	WI: 20
IN: 30	NM: 31	WV: 3
KS: 23	NV: 45	WY: 27

Miles



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NATIONAL LPTV DISTRIBUTION

Community Broadcasters Association

ALASKA

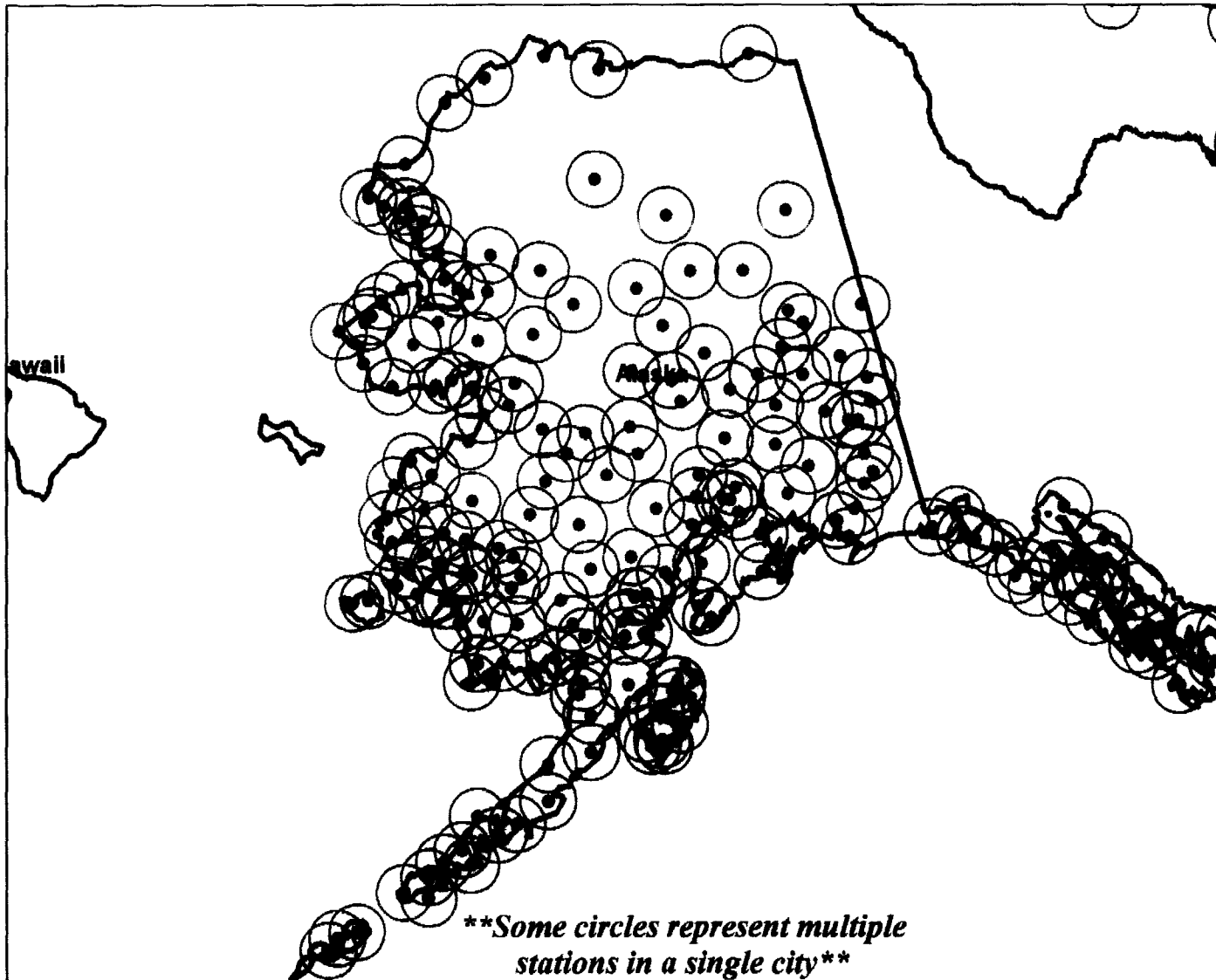
LEGEND



State Boundaries

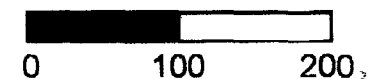


Station's Signal
(20 mile radius)



AK: 274	KY: 20	NY: 85
AL: 29	LA: 28	OH: 33
AR: 23	MA: 10	OK: 48
AZ: 53	MD: 5	OR: 79
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HI: 7	ND: 15	VA: 27
IA: 15	NE: 21	VT: 6
ID: 43	NH: 7	WA: 49
IL: 27	NJ: 5	WI: 20
IN: 30	NM: 31	WV: 3
KS: 23	NV: 45	WY: 27

Miles



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Community Broadcasters Association

ALABAMA

LEGEND

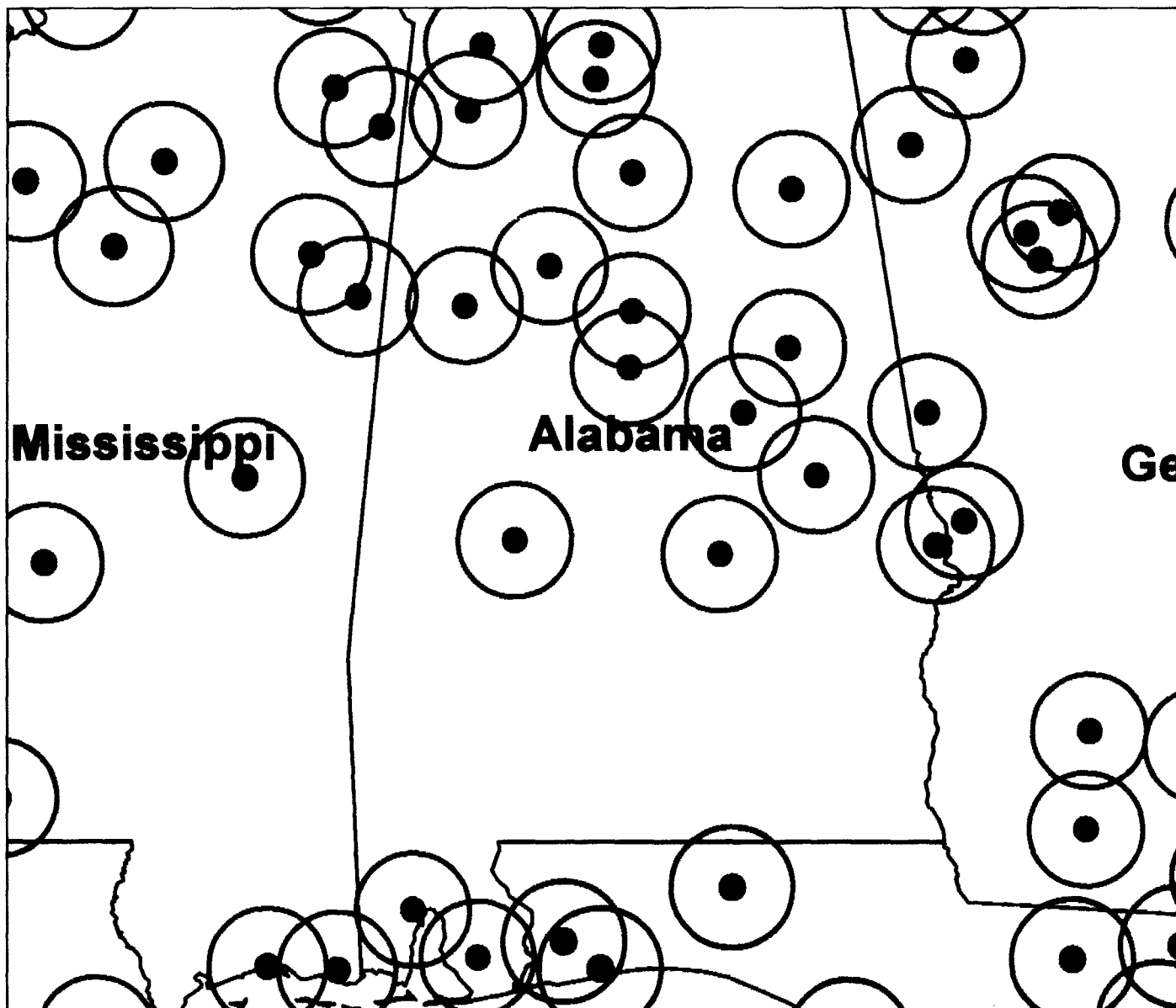


State Boundaries



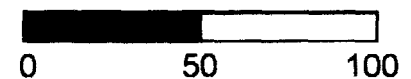
Station's Signal
(20 mile radius)

***Some circles represent multiple
stations in a single city***



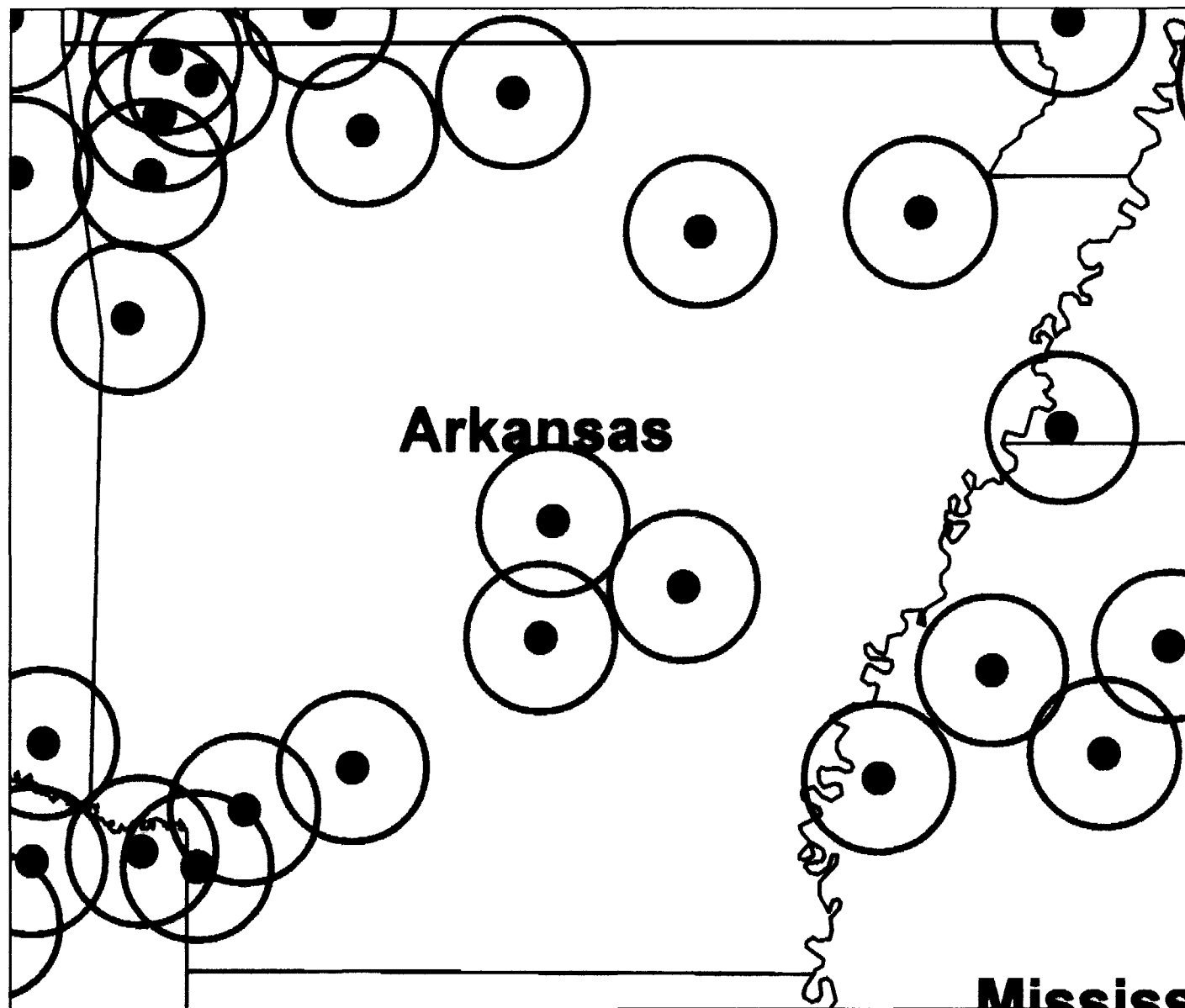
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Miles



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ARKANSAS



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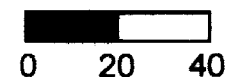
 State Boundaries

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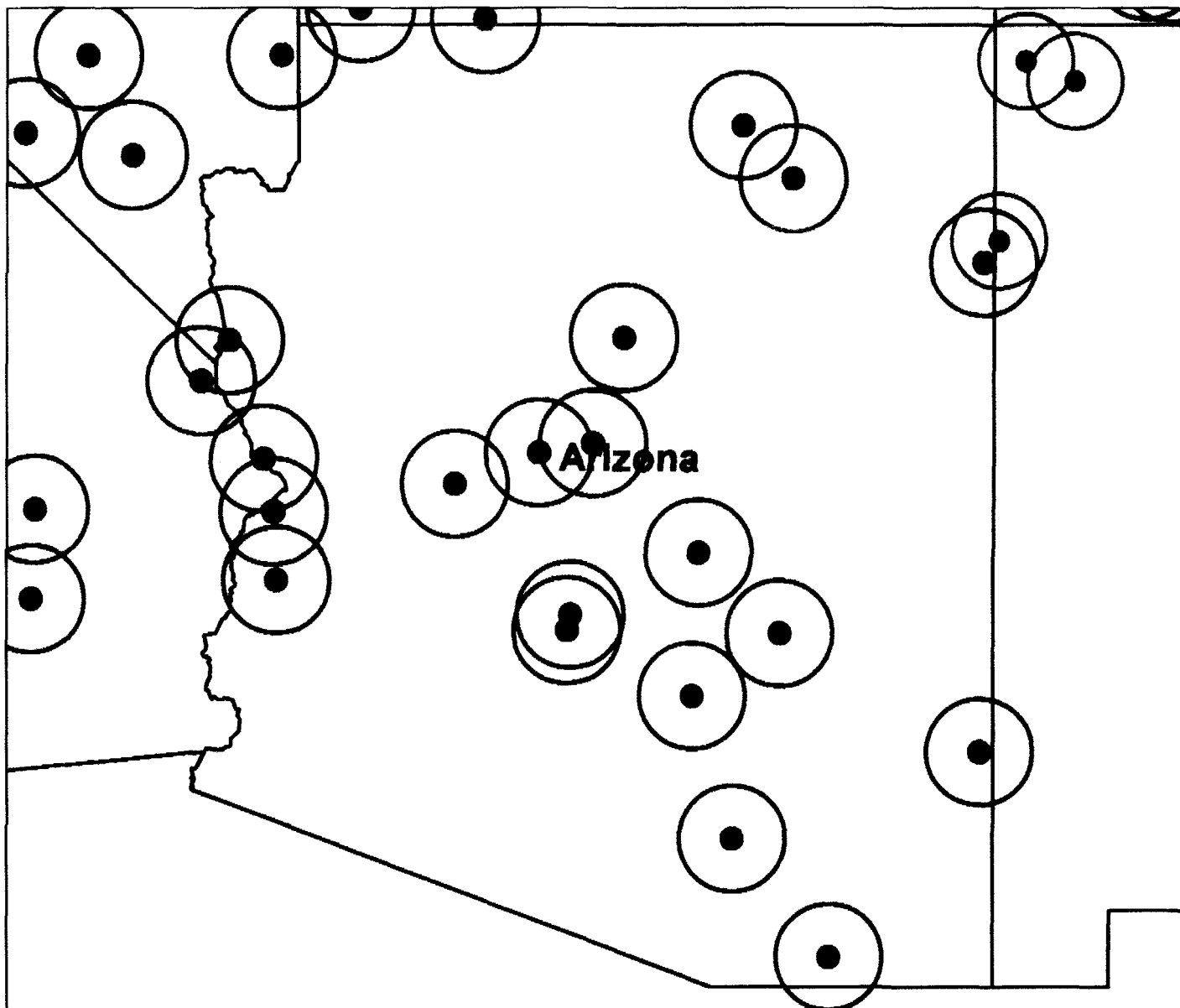
Miles



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Community Broadcasters Association

ARIZONA



LEGEND



State Boundaries



Station's Signal
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Miles



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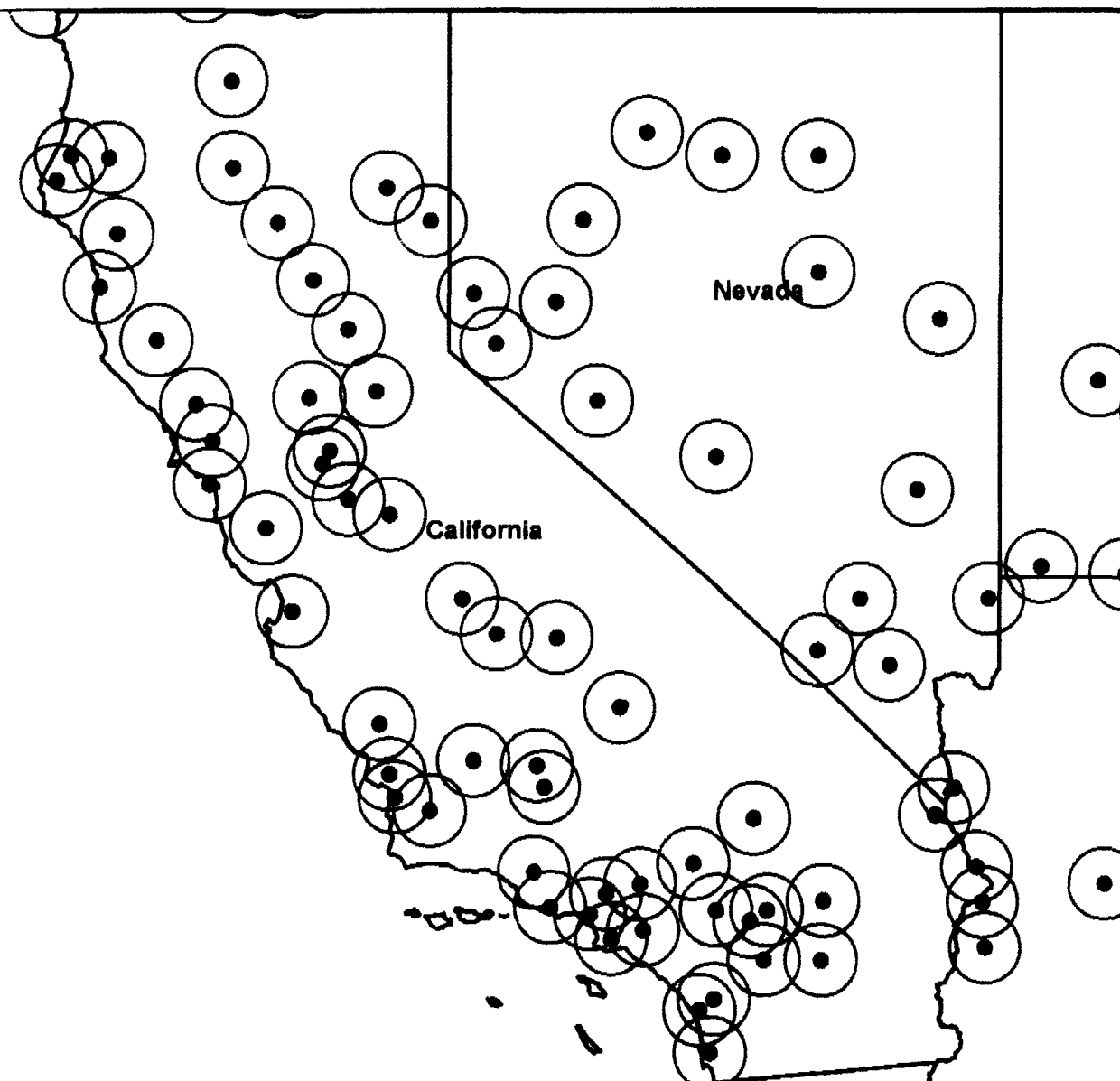
Community Broadcasters Association
CALIFORNIA

LEGEND

□ State Boundaries

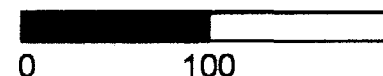
● Station's Signal
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Miles



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Community Broadcasters Association

COLORADO

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State Boundaries



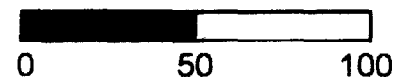
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Colorado

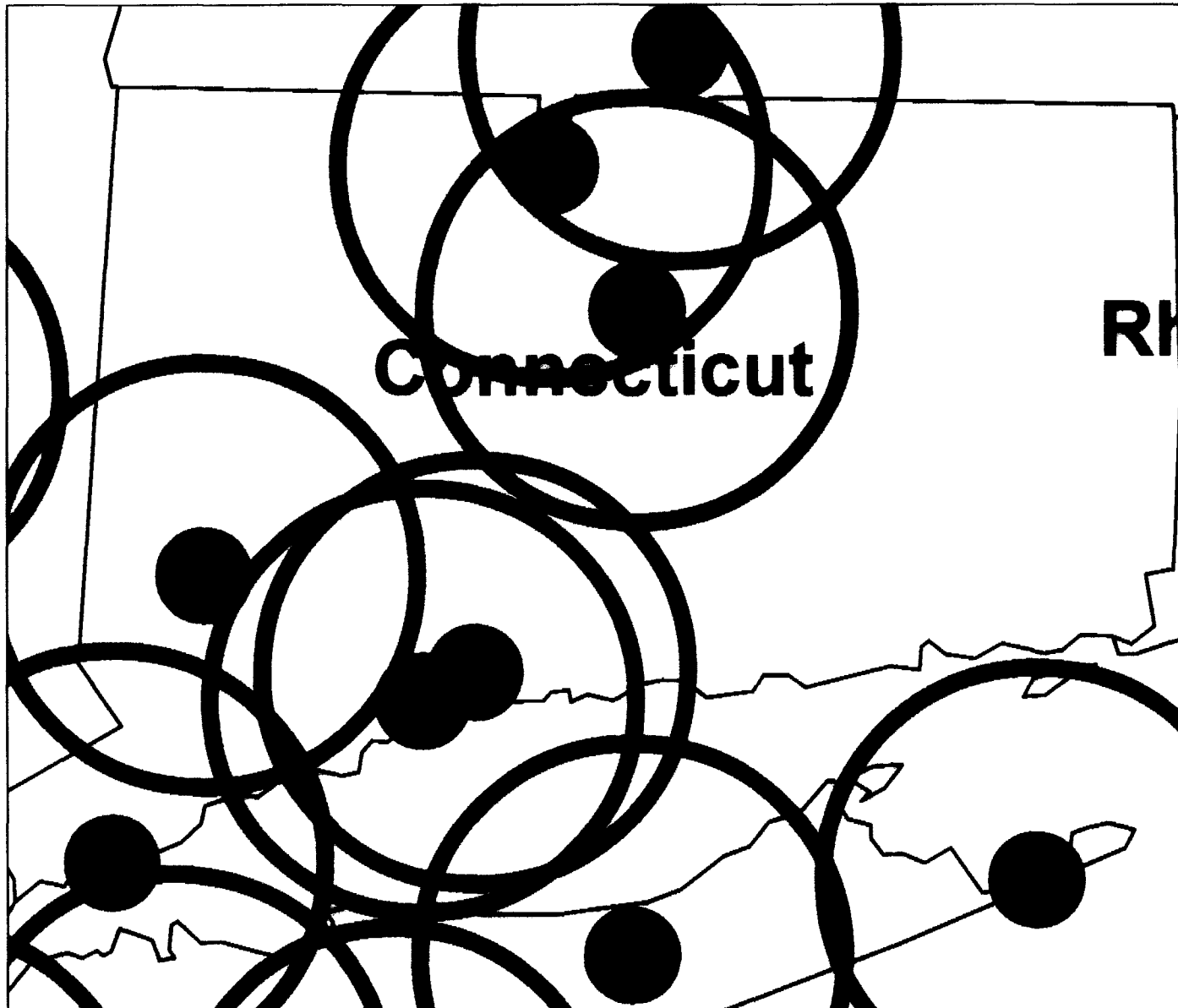
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Miles



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CONNECTICUT



LEGEND

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